## REMARKS

This responds to the Office Action dated on August 30, 2006.

Claims 1, 7, 11, 13, 17, 21, 25, 28, 33, and 40 are amended; as a result, claims 1-46 are now pending in this application. Applicant does not believe that the amendments necessitate a new search. Accordingly, Applicant believes that entry of the amendments is appropriate.

*§112 Rejection of the Claims*

Claim 25 was rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. The errant "the" in the phrase "the another device" was deleted. This amendment is made to correct an informality and is therefore appropriate and should be entered by the Examiner to remove the rejection. Applicant respectfully requests an indication of the same.

*§102 Rejection of the Claims*

Claims 1-5, 7-9, 13-18, 21, 23 and 25-27 were rejected under 35 U.S.C. § 102(e) as being anticipated by de la Iglesia et al. (U.S. Patent No. 6,490,703). It is of course fundamental that in order to sustain an anticipation rejection that each and every step or element in the rejected claims must be taught or suggested by the cited reference.

More specifically, a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently in a single reference. *Verdegaal Bros.v. Union Oil Co. of California*, 814 F.2d 628, 631,2 USPQ 1051, 1053 (Fed. Cir. 1987). Additionally, "[t]he identical invention must be shown in as complete detail as contained in the . . . claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claims.

The Examiner maintains that de la Iglesia teaches two separate devices, namely the processor 304 and the memory interface 114 and memory 306 (Examiner asserted second device) illustrated in FIG. 5 of de la Iglesia. The components or purported devices cited by the Examiner are all internal to a single computer 330 (device). This again comports with the previous arguments asserted by the Applicant. Those arguments stated that in de la Iglesia the

data being inverted was self-contained within a single device. Previously Applicant had attempted to use the just terminology associated with the term "external" in order to highlight this distinction. The Examiner objected to the use of the term "external" in isolation to other terms or phrases. Consequently, Applicant rephrased the independent claims to show that there were in fact two separate devices that performed the inversion with Applicant's invention and not one single solitary device (computer 300). Now, the Examiner has taken the position that the computer 300 of de la Iglesia is in fact multiple separate devices.

To distinguish from the Examiner's new interpretation; Applicant has now rephrased the independent claims again, such that each device (transferring and receiving device) is a device, having its own storage and its own processor capabilities. Clearly, the existing de la Iglesia reference cannot support these new limitations because there is but one memory device (storage) and but one processing device in the computer 300 of de la Iglesia. These internal components do not each have their own independent processing and storage capabilities; they cooperate together internally to form one single device a computer 300.

The law of anticipation requires that the reference teach the claim limitations in as complete detail and in the same arrangements as the claim. This cannot be said with the de la Iglesia reference where the data inversion is performed and wholly transacted within a single integrated device (namely a computer 300).

Applicant is trying to make the point that the two separate devices cooperate in the inversion and these two devices are external or not integrated with one another. No matter the interpretation that is supplied with de la Iglesia, there is but one integrated device in which the data inversion is wholly contained and performed. This is not what the Applicant's original filed description is riddled with and is not what Applicant has claimed. Applicant believes the newly added amendments now make this point clear and respectfully request that the Examiner remove the rejections with respect to de la Iglesia and permit the claims to be allowed.

Claims 1-37, 39-41 and 44-46 were rejected under 35 U.S.C. § 102(b) as being anticipated by Norman (U.S. Patent No. 5,873,112). Again to anticipate a claim, each and every limitation must be taught or suggested in the cited reference and the reference must show the limitations in as complete detail and arranged as the claim dictates.

The Examiner makes the point that Norman includes two different devices namely the controller 429 and memory cell 416 referenced in FIG. 7 of Norman. Norman indicates these components are part of an integrated circuit and is to be interpreted in the same manner as FIG. 3. This is again similar to de la Iglesia in that an integrated device is used for the inversion. Applicant has taken a different approach where non-integrated devices cooperate to perform the inversion. Applicant believes that the claims now make this point clear in view of how the Examiner appears to be interpreting the references.

Accordingly, Applicant respectfully requests that the rejections be withdrawn in view of the above remarks and amendments because neither Norman or de la Iglesia teach the claim limitations positively recited in the identical manner and in the same arrangement as is required by the law of anticipation.

*§103 Rejection of the Claims*

Claims 38, 42 and 43 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Norman (U.S. Patent No. 5,873,112) in view of Goldstein (U.S. Publication No. 2003/0028672). Claim 38 is dependent from independent claim 33 and claims 42 and 43 are dependent from independent claim 40; therefore, for the remarks presented above with respect to independent claims 33 and 40, the rejections of claims 38 and 42-43 should be withdrawn. Applicant respectfully request an indication of the same.

## CONCLUSION

Applicant respectfully submits that the claims are in condition for allowance and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicant's attorney (513) 942-0224 to facilitate prosecution of this application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 19-0743.

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CERTIFICATE UNDER 37 CFR 1.8: The undersigned hereby certifies that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail, in an envelope addressed to: Mail Stop AF, Commissioner of Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on this 30 day of October 2006.

LISA POSANSKE
Name

Signature